

# **PROPOSED ORDER**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC. and  
AT&T MOBILITY LLC,

Defendants.

Civil Action 6:12-cv-00022 (MHS-CMC)

JURY TRIAL DEMANDED

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC. and  
CELLCO PARTNERSHIP *d/b/a*  
VERIZON WIRELESS,

Defendants.

Civil Action No. 6:12-cv-00122 (MHS-CMC)

JURY TRIAL DEMANDED

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC. and  
SPRINT SPECTRUM L.P.,

Defendants.

Civil Action No. 6:12-cv-00123 (MHS-CMC)

JURY TRIAL DEMANDED

**[PROPOSED] ORDER GRANTING PLAINTIFF'S  
MOTION TO COMPEL SOURCE CODE**

Before this Court is the Plaintiff's Motion to Compel Source Code. The Court  
having considered the motion,

IT IS THEREFORE, ORDERED, that the Plaintiff's Motion should be **GRANTED**,  
and ALU is hereby ORDERED to immediately make available for inspection by Adaptix all

source code and other documentation showing the full operation and functionality of “any aspects or elements” of the nine accused instrumentalities at issue, i.e., 9100 Multistandard Base Station; 9412 eNodeB Compact; 9460 Pico (a/k/a p426 Pico); 9926 Distributed Base Station; 9442 Remote Radio Head; lightRadio 9711 Indoor Base Station for LTE; lightRadio 9712 Outdoor Base Station for LTE; and 9760 Small Cells, including 9764 Metro Cell Outdoor LTE and 9768 Metro Radio Outdoor, and to do so in an efficient, effective, and accelerated way.